

AFFIDAVIT

I, Christina Grady, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent at the Federal Bureau of Investigation (“FBI”). I have been an FBI Special Agent for ten years. I am presently assigned to the White Collar Squad of the FBI Boston, Providence Residence Agency. Based on my training and experience among other things, I am familiar with the investigation of financial crimes which include the following: identity theft, access device fraud, bank fraud, and wire fraud. During the course of my career with the FBI, I have investigated numerous financial crimes involving fraud. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant against KEVIN MANCIERI (“MANCIERI”). As will be shown below, there is probable cause to believe that MANCIERI conspired with others to execute a scheme to obtain money, funds and property owned by, or under the custody and control of, financial institutions, by means of false and fraudulent pretenses, representations and promises, contrary to 18 U.S.C. § 1344(2), in violation of 18 U.S.C. § 1349 (Count One – Conspiracy to Commit Bank Fraud).

3. As set forth below, investigation has revealed that MANCIERI applied for loans guaranteed by the Small Business Administration (“SBA”) designed to assist small businesses and their employees during the COVID-19 crisis. MANCIERI, alone or with the assistance of associates, applied for at least eight (8) loans, two in his own name, and six loans in the names of his associates D.S. (two loans), D.G. (two loans), R.P. (one loan), and J.F. (one loan). In these various loan applications, MANCIERI applied for loans in the names of

four (4) different sole proprietorships purporting to perform flooring and carpeting services. The applications listed multiple employees as working for the different companies and provided overlapping information concerning the companies. The applications were also submitted with digitally altered personal bank statements, attempting to represent business bank accounts. MANCIERI submitted two different 2019 Forms 1040 Schedule C, "Profit or Loss From Business (Sole Proprietorship)" for the same business with two different income totals. In addition, MANCIERI submitted Form 1040 Schedules C representing the income and expenses for two separate sole proprietorships with the same income and expenses for the 2019 tax year.

4. In total, MANCIERI fraudulently sought at least \$337,096 in forgivable loans guaranteed by the SBA by claiming to have employees earning wages for his own, and his associates' sole proprietorships when, in truth and in fact, there were little to no employees working for any of the listed entities when the loan applications were submitted. Through these fraudulent applications, MANCIERI caused at least \$131,414 in funds to be disbursed. MANCIERI personally received approximately \$29,038 in loan proceeds obtained directly to him through fraudulent means and conspired with others to receive up to half of the proceeds disbursed to other entities; MANCIERI thereby also received at least \$49,400 in kickbacks for applying for fraudulent loans for his associates.

The CARES ACT and the Paycheck Protection Program

5. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a federal law enacted on March 29, 2020 designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (“PPP”). In or around April 2020, over \$300 billion in additional PPP funding was authorized by Congress.

6. The PPP allows qualifying small-businesses and other organizations to receive loans with a maturity of 2 years and interest rate of 1%. PPP loan proceeds must be used by businesses on payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal to be forgiven if businesses spend the proceeds on these expenses within 8 weeks of receipt and use at least 75% of the forgiven amount for payroll. The amount of PPP funds a business may receive is determined by the number of employees employed by the business and their average payroll costs for a period of 2.5 months. Businesses applying for a PPP loan must provide documentation, such as IRS Forms 940 and 941, to confirm that they have in the past paid employees the compensation listed on the application.

7. The PPP is overseen by the SBA, which is headquartered at 409 3rd Street SW, Washington, DC 20416, and has authority over all loans. Individual PPP loans, however, are issued by private approved lenders (most commonly, banks and credit unions), who receive and process PPP applications and supporting documentation, and then make loans using the lenders’ own funds.

Background of the Investigation

8. In April 2021, an investigation was initiated into MANCIERI for allegedly conspiring to defraud financial institutions and the SBA in order to obtain fraudulent PPP Loans for himself and other individuals. An FBI Confidential Human Source (hereinafter “CHS-1”) told agents that MANCIERI had worked with D.S., and potentially others, to submit false applications to internet-based banks to obtain the proceeds from PPP Loans. CHS-1 became aware of this activity when he was informed by his bank that he had failed to qualify for a PPP Loan for his business because his Employee Identification Number (“EIN”) had already been included in applications for two PPP Loans. The bank told CHS-1 that the PPP Loan applications were submitted by Armadillo Flooring. Armadillo Flooring is known to CHS-1 as he previously paid D.S. in 2019 and 2020 as a subcontractor; D.S. is paid through Armadillo Flooring.

KEVIN MANCIERI PPP Loans

Cross River Bank / BlueVine Capital Inc. First Draw

PPP Loan Application for “Mancieri Flooring Co LLC”

9. A loan application under the Paycheck Protection Program was received by BlueVine Capital on or about April 18, 2020 via internet address: <https://skywalker.bluevine.com/client/534026>. Client ID 534026 is associated with the account business name “Mancieri Flooring co llc,” authorized person is “kevin mancieri,” the email address is kman1825@gmail.com, and phone number of 401-252-9339. The business type is listed as a Sole Proprietor. The loan application listed an annual revenue of approximately \$79,000. The business address listed on the application is 114 Algonquin Road, East Providence, Rhode Island. The EIN utilized on the application is xxx-xx-3199,

which is also listed on the application as MANCIERI's Social Security Number. MANCIERI provided bank account and routing number for Bank of America account ACCT 3662. On or about May 23, 2020, MANCIERI electronically signed a U.S. Small Business Settlement Sheet, SBA loan number 2221067810, borrowing from Cross River Bank, in the amount of \$8,635.

10. With the loan application, MANCIERI provided a Bank of America account statement for the period of January 22, 2020 to February 18, 2020, for account ACCT 3662. The statement appears to be electronically altered to appear as though the account belongs to Mancieri Flooring Co., LLC. Bank of America provided records in response to a grand jury subpoena, including statements for ACCT 3662 from December 19, 2019 through April 20, 2021. The actual Bank of America statement for the same period, January 22, 2020 to February 18, 2020, was compared to the one MANCIERI submitted to BlueVine Capital, and it was confirmed the statement was altered to include "Mancieri Flooring Co LLC" in the address line of the statement, shown below.

| Bank of America Statement per Bank of America Subpoena | Statement provided by MANCIERI to BlueVine Capital |
|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| KEVIN M MANCIERI 114 ALGONQUIN RD RUMFORD, RI 02916-3504 | KEVIN M MANCIERI MANCIERI FLOORING CO LLC 114 ALGONQUIN RD RUMFORD, RI 02916-3504 |

11. I compared the statement MANCIERI provided to BlueVine Capital for the period of January 22, 2020 to February 18, 2020 to the statement Bank of America provided for ACCT 3662. There appear to be multiple manipulations to the statement provided to BlueVine Capital. The following relates to the Bank of America statement MANCIERI

provided to BlueVine LLC: Account holder Mancieri Flooring, starting balance on January 22, 2021 of \$3848.06 (sic), deposits and other additions of \$8,773.70 withdrawals and other subtractions -\$2,602.91, checks \$0.00, service fees -\$57.50 and an ending balance of \$10,018.85. (**Figure 1** below). ACCT 3662 provided by Bank of America: starting balance on January 22, 2021 of \$694.54, deposits and other additions of \$2,173.70 withdrawals and other subtractions -\$2,602.91, checks \$0, service fees -\$57.50 and an ending balance of \$207.83 (**Figure 2** below).

Figure 1

| | |
|--------------------------------------------------------------------------------------------|--------------------|
| KEVIN M MANCIERI MANCIERI FLOORING CO LLC 114 ALGONQUIN RD RUMFORD, RI 02916-3504 | |
| Your Adv Plus Banking | |
| for January 22, 2020 to February 18, 2020 | |
| KEVIN M MANCIERI | |
| Account summary | |
| Beginning balance on January 22, 2020 | 53848.06 |
| Deposits and other additions | 8,773.70 |
| Withdrawals and other subtractions | -2,602.91 |
| Checks | -0.00 |
| Service fees | -57.50 |
| Ending balance on February 18, 2020 | \$10,018.85 |

Figure 2

| | |
|----------------------------------------------------------------|-----------------|
| KEVIN M MANCIERI 114 ALGONQUIN RD RUMFORD, RI 02916-3504 | |
| Your Adv Plus Banking | |
| for January 22, 2020 to February 18, 2020 | |
| KEVIN M MANCIERI | |
| Account summary | |
| Beginning balance on January 22, 2020 | \$694.54 |
| Deposits and other additions | 2,173.70 |
| Withdrawals and other subtractions | -2,602.91 |
| Checks | -0.00 |
| Service fees | -57.50 |
| Ending balance on February 18, 2020 | \$207.83 |

In addition, a deposit was made on January 27, 2020 to each account; however, the Mancieri Flooring account statement submitted to BlueVine LLC shows a deposit in the amount of \$6,600 with a description of as shown below:

| | | |
|----------|-------------------------------------------------------------------------------|---------|
| 01/27/20 | WIRE TYPE:WIRE IN DATE: 200127 TIME:1450 ET TRN:2020012700508348 | 6600.00 |
| | SEQ:787000002171262/001247 ORIG:CAM'S CARPET, LLC ID:5901180 SND BK:DIGITAL F | |
| | FEDERAL CREDIT UNION ID:211391825 PMT DET:DELTA AIR LINES PAYMENT REMITTANCE | |

The Bank of America provided statement for ACCT 3662 shows the same description and date for the transaction in the amount of \$800.

| | | |
|----------|-------------------------------------------------------------------------------|--------|
| 01/27/20 | WIRE TYPE:WIRE IN DATE: 200127 TIME:1450 ET TRN:2020012700508348 | 800.00 |
| | SEQ:787000002171262/001247 ORIG:CAM'S CARPET, LLC ID:5901180 SND BK:DIGITAL F | |
| | FEDERAL CREDIT UNION ID:211391825 PMT DET:DELTA AIR LINES PAYMENT REMITTANCE | |

All other transactions in the statements remained the exact same. This leads me to believe MANCIERI manipulated the bank statement for ACCT 3662 to provide a fraudulent bank statement to BlueVine LLC in order to receive a PPP Loan.

12. On April 23, 2020, at approximately 7:48 PM, MANCIERI received an email sent to kman1825@gmail.com from a representative notifying MANCIERI that more documents were required to be submitted to complete the PPP Loan application with BlueVine, including payroll documentation and employment tax documents. At approximately 8:20 AM on April 24, 2020, MANCIERI emailed himself a link for “How to Do Payroll in Excel in 7 Steps [+ Free Template]”. At approximately 12:22 PM on April 24, 2020, MANCIERI attempted to reply to the representative and sent an email including four attachments, a Form 941 for period of January, February, and March of 2020 (pages 1 and 2 separately), a photo of MANCIERI’s Rhode Island driver’s license, number xxx1030, and an excel spreadsheet labeled “payroll”. The email was sent to the wrong address, and MANCIERI sent the attachments once again on April 27, 2020.

13. Records provided by BlueVine Capital included an inquiry from MANCIERI to Bluevine on May 6, 2020, at 10:55AM, requesting the status of his loan; email kman1825@gmail.com was utilized as the requester’s contact. The funds were directly deposited into Bank of America ACCT 3662, on or about May 27, 2020.

14. MANCIERI also included with the loan application a 2019 Form 1040, Schedule C, Profit or Loss from Business (only the Schedule C was provided, not the Form 1040, U.S. Individual Income Tax Return). MANCIERI is named as the sole proprietor of Mancieri Flooring Co, LLC. The EIN utilized on the Schedule C is 46-4592952. The

Schedule C indicates that MANCIERI reported earning gross receipts from his business in 2019 of \$95,600, with a net profit of \$41,450.

15. On February 7, 2022, the IRS Office of Disclosure provided a transcript of MANCIERI's Form 1040, U.S. Individual Income Tax Return, for the year ended December 31, 2019. The transcript indicates that MANCIERI's Schedule C, Profit or Loss From Business, filed with the IRS, reported in 2019 earned gross receipts of \$4,698, and a net profit of \$1,630, significantly less than the 2019 Schedule C provided to BlueVine Capital. I believe this tax return was fabricated to deceive BlueVine Capital into approving a PPP Loan for Mancieri Flooring Co LLC, which MANCIERI would not qualify for otherwise. In addition, the IRS Office of Disclosure also included a Certification of Lack of Records indicating the IRS has no other records of business or employment tax filings from MANCIERI or Mancieri Flooring Co LLC from January 1, 2019 through December 31, 2021.

Customers Bank / SmartBizLoans.com

Second Draw PPP Loan Application for "Mancieri Flooring Co LLC"

16. A loan application under the PPP was received by SmartBizLoans.com on or about January 11, 2021 for \$20,403 through Customers Bank – Paycheck Protection Second Draw. The loan application was submitted by Kevin MANCIERI, for Mancieri Flooring Co. LLC, with a phone number of 401-252-9339 and an email address of kman1825@gmail.com, business address 114 Algonquin Road, East Providence, RI, and user ID254139 associated with loan ID 335234. The EIN utilized on the application is xxx-xx-3199, which is also listed on the application as MANCIERI's Social Security Number. The application indicated an average monthly payroll of \$8,161 for Mancieri Flooring Co. LLC with zero employees. The application also indicates the purpose of the loan as Rent/Mortgage Interest, Utilities, and

Covered Operations Expenditures. The SmartBizLoans.com information indicates a balance sheet was not provided, but a 2019 Tax Return was submitted. MANCIERI's residential address is listed as 114 Algonquin Road, East Providence, RI 02916, the same operating address as was provided for Mancieri Flooring Co, LLC.

17. Provided with MANCIERI's application was an electronic copy, as well as photos front and back, of a 2019, Form 1040 Schedule C, Profit or Loss From Business, for Mancieri Flooring Co. LLC (only the Schedule C was provided, not the Form 1040, U.S. Individual Income Tax Return). MANCIERI is named as the sole proprietor of Mancieri Flooring Co, LLC. The Schedule C indicates that MANCIERI reported earning gross receipts from his business of \$152,082, with a net profit of \$97,932. When compared to the 2019 Schedule C provided with MANCIERI's First Draw PPP Loan application to BlueVine Capital and Cross River Bank, the only difference appears in Line 1, gross receipts or sales, and corresponding Lines 29 and 31, which are computed using amounts for income and expenses. The difference, \$56,482, indicates that MANCIERI increased the "Gross receipts or sales" line on the 2019 Schedule C prior to submitting it to SmartBizLoans.com and Customers Bank. The modifications in the 2019 Schedule C provided to BlueVine Capital and Cross River Bank lead me to believe that both of the Schedule C's are fraudulent.

18. I compared the Schedule C provided to SmartBizLoans.com/Customers Bank to MANCIERI's tax returns filed with the IRS, provided by the IRS Office of Disclosure. MANCIERI's Form 1040, U.S. Individual Income Tax Return, for the year ended December 31, 2019, includes a Schedule C, Profit or Loss From Business. As noted previously, the filed Schedule C reported earned gross receipts of \$4,698, and a net profit of \$1,630; significantly less than the 2019 Schedule C provided to SmartBizLoans.com/Customers Bank. I believe

the Schedule C was not only fabricated, but the gross receipts and income were grossly inflated in order to defraud SmartBizLoans.com/Customers Bank into approving a larger PPP Loan for Mancieri Flooring Co LLC, which MANCIERI would not qualify for otherwise.

19. Provided with the application was a Rhode Island Driver License for MANCIERI, date of birth xx/xx/1973, address of 114 Algonquin Road, East Providence, RI 02916.

20. Customers Bank also provided email correspondence between MANCIERI and customer service representatives from SmartBizLoans. Each of the correspondence files indicated an individual using the email kman1825@gmail.com, contacted SmartBizLoans customer service between January 12, 2021 and January 15, 2021 to facilitate the processing the loan application and the submission of documents. In addition, MANCIERI logged in using the same email address, on February 18, 2021, after his loan proceeds had been deposited, and left a five-star review and comment for a customer service representative. The proceeds of the PPP loan, \$20,403, were directly deposited into Bank of America ACCT 3662, on or about February 17, 2021.

D.S. PPP Loans

Itria Ventures LLC PPP Loan Application of “Armadillo Flooring”

21. A loan application under the PPP was received by Itria Ventures LLC on or about March 3, 2021. The loan application was from D.S., as the sole proprietor of “Armadillo Flooring,” and requested a loan in the amount of \$60,710. The loan was to be used for payroll costs, rent/mortgage, and utilities. No Business TIN/Employee Identification Number (EIN) was noted on the application. The application indicated that the average monthly payroll of Armadillo Flooring was \$24,284 with three (3) employees. The email

address listed on the application was danny18255@gmail.com. The business address of Armadillo Flooring was identified as 18 Williams Street, Warren, Rhode Island. The 100% owner of Armadillo Flooring was listed as D.S. D.S.'s Social Security Number (SSN) was listed, ending in 3489. The application indicates that the business was established on March 20, 2005. The phone number listed on the application documents is (401) 345-2278. The loan was electronically signed on March 3, 2021 by D.S.

22. Provided with the PPP application was a photo of the front and back of a State of Rhode Island driver's license for D.S., number xxx3204, with a date of birth of xx/xx/1958, and address of 18 William Street, Apartment 1, Warren, Rhode Island.

23. An IRS Form 941 was submitted in support of the loan application. A Form 941 is the Employer's Quarterly Federal Tax Return. The EIN utilized on the Form 941 is 05-0482626. The Form 941 provided for D.S., d/b/a Armadillo Flooring, listed wages for 2020 1st Quarter (January, February, March) to be \$26,876.00. The section asking for the number of employees indicates that the business had three (3) employees. The Form 941 is signed and dated April 5, 2020. The phone number utilized on the Form 941 is (401) 345-2278.

24. An IRS Form 940 for 2019 was submitted in support of the loan application. A Form 940 is the Employer's Annual Federal Unemployment (FUTA) Tax Return. The EIN utilized on the Form 940 was the same as the Form 941. The Form 940 provided for D.S., d/b/a Armadillo Flooring, listed total payments to all employees in 2019 to be \$256,247.00. The Form 940 was signed and dated January 10, 2020.

25. On July 1, 2021, the IRS Office of Disclosure issued a fact of filing letter stating there is no relationship between Armadillo Flooring and the EIN 05-0482626.

Armadillo Flooring did not file Forms 941 for 2019 or 2020 with the IRS. Armadillo Flooring

never submitted an IRS Form 940 for the years 2019 and 2020 to the IRS. This leads me believe the applicant for Armadillo Flooring submitted fraudulent Form 941 Employer's Quarterly Federal Tax Returns and Form 940 to Itria Ventures LLC in order to receive a PPP loan. Furthermore, the IRS Disclosure form stated the EIN 05-0482626 is invalid.

26. A Form 1040 Schedule C, Profit and Loss From Business, for 2019 was submitted in support of the loan application. A Schedule C is attached to an U.S. Individual Income Tax Return, Form 1040, to report profits and losses from a sole proprietorship. The EIN utilized on the Schedule C is the same as the submitted Forms 940 and 941. The Schedule C indicates that D.S. is the sole proprietor of Armadillo Flooring, and that the business was started or acquired in 2019. The Schedule C also indicates that D.S. made payments requiring Forms 1099, and that the required Forms 1099 were filed. Gross receipts in 2019 reported on the Schedule C were \$341,795.00.

27. On February 7, 2022, the IRS Office of Disclosure provided electronic copies of D.S.'s Form 1040, U.S. Individual Income Tax Return, for the 2019 tax year which was filed with the IRS on or about March 31, 2020. Included with D.S.'s 2019 tax return is a Schedule C, Profit and Loss From Business, indicating reported gross receipts of \$14,815. In addition to gross receipts, other reported items are significantly less than the tax return provided to Itria Ventures, LLC, specifically, there are no expenses listed for wages paid to employees. I believe this tax return, as well the Forms 940 and 941, were fabricated to deceive Itria Ventures, LLC into approving a PPP Loan for Armadillo Flooring, which D.S. would not qualify for otherwise. In addition, the IRS Office of Disclosure also included a Certification of Lack of Records indicating the IRS has no other records of business or

employment tax filings, like Forms 940 and 941, from D.S. or Armadillo Flooring from January 1, 2019 through December 31, 2021.

28. A Bank of America bank statement for the period of December 19, 2020 to January 19, 2021, for account number xxxx xxxx0599 (ACCT 0599), was submitted in support of the loan application. The statement was addressed to D.S. at 18 Williams Street, Warren, Rhode Island.

29. A grand jury subpoena was served to Bank of America requesting all bank records associated with D.S. The bank provided records for D.S., account number xxxx xxxx 7068 (ACCT 7068), address 18 William Ave, Warren, Rhode Island and email address of Danny18255@gmail.com. The signature card does not have a signature because it was an electronic signature and account was opened on February 27, 2021. D.S. utilized DANNY1825 to log into Bank of America. These records show D.S.'s First Draw PPP Loan in the amount of \$60,710, was deposited into ACCT 7068 on or about March 9, 2021.

30. Bank of America also provided bank records for a savings account for D.S. and Kevin M MANCIERI, account number xxxx xxxx 7281 (ACCT 7281), mailing address 18 William Ave, Warren, Rhode Island. The signature card does not have a signature because it was an electronic signature and account was opened on March 9, 2021. KMAN1825 and DANNY1825 have online access to ACCT 7281.

31. Bank of America provided records related to all accounts in D.S.'s name; ACCT 0599 was not included in these records. This leads me to believe that D.S., or someone on D.S.'s behalf, submitted fraudulent bank records to Itria Venture LLC in order to obtain a PPP loan. Furthermore, Bank of America provided records for Kevin MANCIERI, account number xxxx xxxx 3662 (ACCT 3662). I compared D.S.'s ACCT 0599 as provided to Itria

Venture LLC to that of MANCIERI's ACCT 3662 per Bank of America. MANCIERI's Bank of America statement for December 19, 2020 to January 19, 2021 with a starting balance of \$623.81, deposits and other additions of \$6,186.99, withdrawals and other subtractions - \$7,427.31, checks \$0, service fees -\$106.79 and an ending balance of -\$723.30 is exactly the same as the statement D.S. provided to Itria for ACCT 0599. A number of line items throughout the statement for D.S.'s version of the statement appear to have been manipulated to remove the name MANCIERI. For example, date 12/22/2020, deposit from Rhode Island Sta Des:TRADD, ID 3119210403, INDN:MANCIERI in the amount of \$200. D.S.s line item date 12/22/2020, deposit from Rhode Island Sta Des:TRADD, ID 3119210403, INDN: in the amount of \$200. This leads me to believe that D.S. and/or MANCIERI provided a fraudulent bank statement to Itria Ventures LLC in order for D.S. to receive a PPP Loan.

32. Itria Ventures LLC provided a Paycheck Protection Program Promissory Note dated March 7, 2021 for Armadillo Flooring. The Promissory Note indicates the Borrower email to be danny18255@gmail.com and was signed by D.S.

33. On June 23, 2021, I served a grand jury subpoena on Google for email address danny18255@gmail.com and Danny1825@gmail.com. Google responded on June 23, 2021 with subscriber information for each account. Google records provided indicate the Danny1825@gmail.com account was created on August 19, 2010 with an IP address of 116.14.76.180 and a recovery email address of hello@gmail.com. No further details were revealed. Danny18255@gmail.com revealed user name D.S., with account creation date April 21, 2020 using IP address of 108.34.133.73. No recovery email address was provided. Phone number 401-345-2278 was provided.

Itria Ventures LLC PPP Second Draw Borrower Application of “Armadillo Flooring”

34. A loan application under the PPP was received by Biz2Credit on or about April 8, 2021. The business TIN listed on the second draw application was 05-0482626. The application also indicates annual gross business receipts of \$225,585 and \$341,795 for 2020 and 2019 respectively. The remaining information on the loan application was exactly the same as the application submitted on March 3, 2021. The loan application was from D.S., as the sole proprietor of “Armadillo Flooring,” and requested a loan in the amount of \$60,710. Ultimately, the loan application was denied and no funds were disbursed. The loan was to be used for payroll costs, rent/mortgage, and utilities. The application indicated that the average monthly payroll of Armadillo Flooring was \$24,284 with three (3) employees. The email address listed on the application was danny18255@gmail.com. The business address of Armadillo Flooring was identified as 18 Williams Street, Warren, Rhode Island. The 100% owner of Armadillo Flooring was listed as D.S. D.S.’s Social Security Number (SSN) was listed, ending in 3489. The application indicates that the business was established on March 20, 2005. The phone number listed on the application documents is (401) 345-2278. The loan was electronically signed on April 8, 2021 by D.S.

35. Provided with the PPP application was a photo of the front and back of a State of Rhode Island driver’s license for D.S., number xxx3204, with a date of birth of xx/xx/1958, and address of 18 William Street, Apartment 1, Warren, Rhode Island.

36. The same IRS Forms 940 and 941 were submitted in support of the loan application as those previously submitted to Itria Ventures LLC for D.S.’s First Draw PPP loan.

37. On February 7, 2022, the IRS Office of Disclosure provided Certification of Lack of Records stating Armadillo Flooring did not file Forms 941 for 2019 or 2020 with the IRS. Armadillo Flooring never submitted an IRS Form 940 for the years 2019 and 2020 to the IRS. As previously stated, this leads me believe the applicant for Armadillo Flooring again submitted fraudulent Form 941 Employer's Quarterly Federal Tax Returns and Form 940 to Itria Ventures LLC to receive a PPP loan. In addition, the IRS Office of Disclosure stated there is no relationship between Armadillo Flooring and the EIN 05-0482626.

38. The same Bank of America bank statement that was previously submitted to Itria Ventures for D.S.'s First Draw PPP Application, period of December 19, 2020 to January 19, 2021, for account number xxxx xxxx0599 (ACCT 0599), was submitted in support of the Second Draw PPP loan application.

39. Two more Bank of America statements for ACCT 0599 were submitted to Itria Ventures LLC, for the periods November 18, 2020 through December 18, 2020 and February 18, 2021 through March 18, 2021. Based on my determination that statements related to ACCT 0599 have been manipulated, I compared these statements to the Bank of America provided records for MANCIERI, ACCT 3662. Based on this comparison, I determined both of the additional statements, ending December 18, 2020 and March 18, 2021, were fraudulently manipulated using MANCIERI's ACCT 3662 statement for the period of November 18, 2020 through December 18, 2020. See the table below which shows the changes MANCIERI made to the altered statements:

| | Provided to Biz2Credit | Provided to Biz2Credit | Bank of America Subpoena Records |
|---------------------------------------|---------------------------|---------------------------|-------------------------------------|
| Acct # | 0599 | 0599 | 3662 |
| Statement Period | 11/18/20 - 12/18/20 | 02/18/21 - 3/18/21 | 11/18/20 - 12/18/20 |
| Beg. Balance | \$2,147.28 | \$2,147.28 | \$2,147.28 |
| Deposits and other additions | 6,583.47 | 67,293.47 | 6,583.47 |
| Withdrawals and other subtractions | -3,436.94 | -59,336.94 | -3,436.94 |
| Checks | -4,600.00 | -55,900.00 | -4,600.00 |
| Service fees | -70.00 | -70.00 | -70.00 |
| Ending Balance | \$623.81 | \$1996.87 * | \$623.81 |

**The balance was not correctly formatted on the statement, no comma was included in the number; it should read \$1,996.87. Additionally, the fabrications made to this statement do not properly sum to the ending balance indicated on the statement provided. If this activity did occur, the ending balance would result in an overdrawn account, with a balance of -\$45,866.19 (\$2,147.28 plus additions of \$67,293.47, less subtractions of \$59,336.94, LESS cleared checks of \$55,900.00, less fees of \$70.00, equals negative \$45,866.19.*

40. The Bank of America statement ACCT 0599 for the period ending March 18, 2021 that was provided to Itria Ventures, was altered to indicate the receipt of D.S.'s First Draw PPP Loan, of \$60,710, into ACCT 0599 on March 9, 2021. The statement shows a deposit on 03/09/21 with the description "PPP LOAN DES: TRADD ID: 55-47728502 INDN:ARMADILLO FLOORING CO ID:7056000522 PPD" and an amount of 60,710.00. As previously noted, The Bank of America statement for ACCT 7068, for the period of March 1, 2021 through March 18, 2021, includes a deposit of \$60,710.00. The description of this

deposit reads, "Itria Ven 16 DES:Danny ACH ID:Trans#1469942 INDN:D.S. CO ID:1465024623 CCD"

41. On May 18, 2021, an email from S.S., using the email account sanghash.srivastava@biz2credit.com was sent to the email account danny18255@gmail.com. The email indicated the PPP application was still not funded because the following documents were still needed: a completed filed Form 1040 for 2019 or 2020, a bank statement with highlighted expenses using the PPP first draw loan, and a 2019 IRS Form 1099-MISC or 1099-NEC. On May 19, 2021, an email was sent from danny18255@gmail.com, replying to sanghash.srivastava@biz2credit.com. The email stated:

Here is My full Tax Form for 2020 and 1099s for 2020
I also included Highlighted Bank statement where First draw Went into
I also connected Wells fargo Bank were (sic) second draw is going
Please let me know if anything else is needed ,
I hope not cause I've given you everything . This second loan has been a fiasco.
Thanks
D.S.

Attached to this email were three PDF documents, Scan0034.pdf, Scan0035.pdf, and Scan0034.pdf. Scan0034.pdf is a copy of the fraudulently manipulated Bank of America statement ending March 18, 2021 for ACCT 0559. A handwritten note reads, "This is the Bank the first Deposit went" and "Highlighted Areas – This Account was closed." The altered deposit of \$60,710.00 is highlighted, as are four checks in the "Checks" section of the bank statement. Above this section, on Page 5 of 7, a handwritten note states, "These were payouts for jobs employees." I compared Page 5 of 7 from this statement to page five from MANCIERI's Bank of America ACCT 3662, for the period ended December 18, 2020. On the ACCT 3662 statements, there are eight pages, not seven. Page five does display four checks clearing from the account during the statement period, however the clearing date,

check numbers, and amounts have been altered to display a greater decrease from the account.

See the below table which compares the two statements:

| Provided to Itria Ventures, LLC Acct # 0599 Statement Period 02/18/21 - 3/18/21 | | | Bank of America Subpoena Records Acct # 3662 Statement Period 11/18/20 - 12/18/20 | | |
|------------------------------------------------------------------------------------------------------------|----------------|---------------------|--------------------------------------------------------------------------------------------------------------|----------------|--------------------|
| Date | Check # | Amount | Date | Check # | Amount |
| 03/11/21 | 158 | -8,900.00 | 11/20/20 | 131 | -1,400.00 |
| 03/12/21 | 159* | -12,600.00 | 11/20/20 | 134* | -1,400.00 |
| 03/14/21 | 160* | -10,200.00 | 11/20/20 | 139* | -1,400.00 |
| 03/17/21 | 161 | -24,200.00 | 12/10/20 | 140 | -400.00 |
| | | -\$55,900.00 | | | -\$4,600.00 |

Asterisks (*) next to check numbers indicate “There is a gap in sequential check numbers.”

This is commonly used by financial institutions to reflect such occurrences on bank statements to alert the account holder there may be a check outstanding yet to be subtracted from the account. As shown above, and reflected on the altered bank statement (ACCT 0599), there is an asterisk next to check numbers 159 and 160, which are in fact, sequential check numbers, as such I believe this further indicates this statement was altered, and done so incorrectly.

This leads me to believe that D.S. and/or MANCIERI provided a fraudulent bank statement to Biz2Credit in order to deceive representatives to believe the previous loan was deposited into ACCT 0599, and the funds were appropriately used for business expenses.

42. As the email dated May 19, 2021 referenced above indicates, Wells Fargo Bank information was submitted to Biz2Credit. A bank account for the period ending April 30, 2021 for account number 5420186081 (ACCT 6081) was provided to Biz2Credit with Armadillo Flooring’s Second Draw PPP Loan application. The statement is addressed to D.S., with a mailing address of 114 Algonquin Road, Rumford, RI 02916. In addition to the bank statement, images of two checks from ACCT 6081 were provided. The first image,

check number 3759, appears with “VOID” written in black ink across the check, and displays the following name and address:

Armadillo Flooring
18 Williams st
Warren R.I. 02885

The second check image, check number 3760, also had “VOID” written in black ink across the check, and displays a different name:

D.S. DBA: Armadillo Flooring
18 Williams st
Warren R.I. 02885

In addition to the different names and inappropriately written addresses (“st” vs St, & “R.I.” vs RI”), both checks have text in the upper lefthand corner that states “Created by DigitalDashSoft Check Writer.” DigitalDashSoft LLC is an application developer for mobile phones that allows users to write and print checks without ordering checkbooks from a financial institution.

43. A grand jury subpoena was served to Wells Fargo, which provided account opening information for ACCT 6081 and account number 3826078606 (ACCT 8606). The account applications were electronically signed on April 5, 2021. The accounts are in the name of D.S., with a Social Security Number ending in 3489, and date of birth of xx/xx/1958. Contact information includes an email address, danny18255@gmail.com and the mobile phone number 401-328-4123. The application indicates a home address of 18 Williams St, Warren, RI 02885, but a mailing address of 114 Algonquin Road, Rumford, RI, 02916. The mailing address is MANCERI’s home address. I therefore believe MANCIERI utilized D.S.’s personally identifiable information to open Wells Fargo ACCT 6081 and ACCT 8606 without D.S.’s knowledge or permission.

Benworth Capital Partners LLC

Gaulin Floors/D.G.

44. A loan application under the PPP was received by Womply PPP Admin on or about April 22, 2021 for \$20,833 through Benworth Capital Partners LLC. The loan application was submitted by D.G., for D.G., with a phone number of 401-328-4123, business address 114 Algonquin Road, East Providence, RI, and Business ID xxx-xx-7635, number of employees 1, associated with loan ID 1114638909. The application indicated a yearly gross income amount for 2019/2020 of \$152,082 with one employee. The application also indicates the purpose of the loan as Payroll. The address used for the application is the same address MANCIERI provided Bank of America as his address of 114 Algonquin Road, Rumford, RI 02916. This PPP loan application was approved and \$20,833 was disbursed on May 4, 2021.

45. Provided with D.G.'s application was an electronic copy of a 2019, Form 1040 Schedule C, Profit or Loss From Business, for Gaulin Floors (only the Schedule C was provided, not the Form 1040, U.S. Individual Income Tax Return). D.G. is named as the sole proprietor of Gaulin Floors. The EIN utilized on the Schedule C is xxx-xx-7635. The Schedule C indicates that D.G. reported earning gross receipts from his business of \$152,082, with a net profit of \$97,932. I compared to the 2019 Schedule C provided with MANCIERI's Second Draw PPP Loan application to SmartBizLoan and Customers Bank; the only differences appear in Line 23, Taxes and Licenses (on D.G. shows \$14,959 where as MANCIERI shows \$943, Line 24a, Travel (on D.G. shows \$3,276 and MANCIERI shows \$1,459), Line 25, Utilities (on D.G. shows \$25,597 and MANCIERI shows \$3,276), Line 26, Wages (for D.G. is blank, and MANCIERI shows \$27,597). All other line items are the same dollar amount. This leads me to believe that D.G. and/or MANCIERI submitted a false

Schedule C to their applications by utilizing the same Schedule C and manipulating a few expense numbers.

| | D.G.'s Schedule C | MANCIERI Schedule C |
|-----------------------------------|--------------------------|----------------------------|
| Line 1, Gross Receipts | \$152,082 | \$152,082 |
| Line 9, Car and truck expenses | \$1,793 | \$1,793 |
| Line 14, Employee Benefit Program | \$2,478 | \$2,478 |
| Line 15, Insurance | \$791 | \$791 |
| Line 16, Mortgage | \$14,800 | \$14,800 |
| Line 17, Legal and Professional | \$700 | \$700 |
| Line 18, Office Expense | \$435 | \$435 |
| Line 22, Supplies | \$821 | \$821 |
| Line 23, Taxes and Licenses | \$14,959 | \$943 |
| Line 24a, Travel | \$3,276 | \$1,459 |
| Line 25, Utilities | \$25,597 | \$3,276 |
| Line 26, Wages | Blank | \$27,597 |
| Line 28, Total Expenses | \$54,150 | \$54,150 |

46. On February 7, 2022, the IRS Office of Disclosure provided an electronic copy of D.G.'s Form 1040, U.S. Individual Income Tax Return, for the year ended December 31, 2019. The tax return filed with the IRS, on or about February 20, 2020, does not include a Schedule C, Profit or Loss From Business. The tax return lists D.G.'s occupation as a "Cook," and a Form W-2 Wage and Tax Statement indicating D.G. earned wages of \$35,168 from Meritage Restaurant LLC in 2019. The Office of Disclosure also provided a Certification of Lack of Records indicating D.G. did not file any business or employment tax returns from January 1, 2019 through December 31, 2021. I believe the fictitious Schedule C was fabricated to deceive Benworth Capital Partners LLC into approving a PPP Loan for Gaulin Floors, a business D.G. does not actively own or operate, and would not qualify for otherwise.

47. Benworth Capital Partners LLC provided the DocuSign Authorization Agreement for loan payment automatic withdrawals from Navigant Credit Union, Account number 750170530, electronic signature of D.G. dated April 26, 2021. The documents also provide the IP address used when signing the documents. The IP address used was 108.12.225.12. The same IP address used on multiple occasions by KMAN1825 and DANNY1825 used to log into the Bank of America online site.

48. On April 11, 2021 an email from KMAN1825@gmail.com to KMAN1825@gmail.com contained attachments 20210308_161548.jpg and 20210308_161555.jpg. The attachments are photos of the back and front of the Rhode Island drivers license of D.G., date of birth xx/xx/1978, license number xxx0644, address 53 County Road, Barrington, RI 02806-4502.

49. On May 4, 2021, an ACH deposit with the description of “ACH Credit Benworth PPP2 CR – PPP LOANS” in the amount of \$20,833.00 was deposited into D.G.’s Navigant Credit Union personal checking account ending in 0530. On May 4, 2021, D.G. withdrew \$5,000 cash from this account. On May 5, 2021, MANCIERI deposited \$5,000 cash into his Washington Trust checking account ending in 8660. I believe this \$5,000 was a kickback from D.G. to MANCIERI for his involvement in the scheme to defraud Benworth Capital Partners, LLC in order to obtain a PPP Loan.

Itria Ventures LLC

Gaulin Floors/D.G.

50. A loan application under the PPP was received by Itria Ventures LLC on or about March 22, 2021, for \$20,833.00. The loan application was submitted by D.G., for Gaulin flooring (sic), with a phone number of 401-516-0212 and a business address 53 County

Road, Barrington, RI, and Business ID xxx-xx-7635, and one employee. The application indicated monthly payroll costs of \$24,284.00, and that the purpose of the loan is payroll costs, rent or mortgage interest, utilities, and covered operations expenditures.

51. Provided with D.G.'s Itria Ventures LLC loan application was an electronic copy of a 2019, Form 1040 Schedule C, Profit or Loss From Business, for Gaulin Floors. I compared this 2019 Schedule C to the fictitious tax return provided to Benworth Capital Partners, LLC, and determined there were no differences.

52. Provided with the loan application was an electronic copy of D.G.'s Form 1040, U.S. Individual Income Tax Return, for the tax year 2019. The tax return indicates wages of \$15,967, and other income of \$97,932, corresponding to the net profit on line 31 of the fictitious Schedule C. I compared the Form 1040 to the tax return provided by the IRS Office of Disclosure, D.G.'s Form 1040, U.S. Individual Income Tax Return, for the year ended December 31, 2019. The filed Form 1040 contained a significant number of material discrepancies. The wages amount reported on line 1 of the filed tax return, \$35,168, agrees with a Form W-2, also provided by the IRS Office of Disclosure; however, D.G.'s Form 1040 provided to Itria Ventures LLC lists wages of \$15,967. The filed tax return has no other income listed on line 7a, where, as noted above, the Form 1040 provided to Itria Ventures LLC reports other income of \$97,932.

53. Provided to Itria Ventures LLC, were photos of the back and front of the Rhode Island driver's license of D.G., license number xxx0644, address 53 County Road, Barrington, RI 02806-4502. The photos are the same .jpg files identified in the email search warrant for KMAN1825@gmail.com, 20210308_161548.jpg and 20210308_161555.jpg.

54. Also provided to Itria Ventures LLC was a photo of what appears to be an invoice for services from Gaulin floors (sic), of 53 County Rd Barrington R.I, 02806. The invoice is addressed to Leos Resteranta (sic), of 365 Hope Street, Bristol, R.I. 02809. I believe this is a fictitious invoice provided to Itria Ventures LLC to legitimize Gaulin Floors as an active flooring business. Leo's Ristorante, located at 365 Hope Street in Bristol, RI, is owned by P.M. and M.M., MANCIERI's brother and father.

55. On June 25, 2021, \$20,833.00 was deposited into D.G.'s Navigant Credit Union checking account ending in 0530. The transaction description reads "ACH Credit HSBF – PPPL10 6933219000 D.G." On that same date, D.G. purchased an official check from Navigant Credit Union, check number 20135586, in the amount of \$10,400, payable to MANCIERI. The amount represents approximately half of the loan proceeds and is believed to be a kickback to MANCIERI for his cooperation in defrauding Itria Ventures LLC to obtain a PPP Loan.

Common Accounts/IP Addresses

56. Bank of America provided bank records for a savings account for D.S. and Kevin MANCIERI, account number xxxx xxxx 7281 (ACCT 7281), mailing address 18 William Ave, Warren, Rhode Island. The signature card does not have a signature because it was an electronic signature and account was opened on March 9, 2021. KMAN1825 and DANNY1825 have online access to ACCT 7281.

57. On multiple occasions, KMAN1825 and DANNY1825 logged into the Bank of America online site using IP addresses, 108.12.225.12 and 173.69.60.152 along with other IP addresses and other dates.

58. On June 23, 2021, I served a grand jury subpoena to Google for email address kman1825@gmail.com. Google responded on June 23, 2021 with subscriber information Kman1825@gmail.com revealed a recovery email address KMANCIERI@gmail.com and phone numbers 401-252-9339 and 401-328-4123. The following IP addresses were used on the following dates by kman1825@gmail.com:

| | |
|-----------------------|----------------|
| 1/11/2021 | 173.69.60.152 |
| 2/8/2021 | 173.69.60.152 |
| 3/9/2021 – 3/17/2021 | 108.12.225.12 |
| 3/23/2021 | 144.91.199.134 |
| 3-31-2021 -5/7/2021 | 108.12.225.12 |
| 5/11/2021 | 172.98.93.229 |
| 5/11/2021 - 5/23/2021 | 108.12.225.12 |
| 5/28/2021 | 174.250.241.41 |
| 5/31/2021 | 144.91.199.134 |
| 6/4/2021 | 206.214.230.19 |

59. On July 14, 2021, I served a grand jury subpoena to Google for email address KMANCIERI@gmail.com. The user name associated with the account is Kevin MANCIERI. The recovery email address is kMANCIERI@yahoo.com and a recover phone number of 401-345-2278. The following IP addresses were used on the following dates by KMANCIERI@gmail.com:

| | |
|------------------------|---------------|
| 12/12/2020 – 2/20/2021 | 173.69.60.152 |
| 3/12/2021 – 5/6/2021 | 108.12.225.12 |

CHS Contacts

60. On June 8, 2021, CHS-1 (a confidential source) arranged to meet with J.F. of Bristol, RI at CHS-1's business location in Warren, Rhode Island to conduct a consensually recorded conversation. The recorder failed to record this meeting. CHS-1 told agents during the meeting debrief that J.F. told CHS-1 that MANCIERI applied for a PPP Loan on behalf of J.F. J.F. reported that he did not submit any paperwork or sign anything, but that MANCIERI completed everything. J.F. told CHS-1 that MANCIERI wanted to receive about \$7,000 of D.F.'s PPP Loan proceeds. J.F. was upset by this and argued with MANCIERI over the kickback amount but settled on \$7,000. During this meeting, CHS-1 called MANCIERI, and spoke to him on speakerphone with J.F. present. CHS-1 expressed interest to learn more from MANCIERI because CHS-1 was unable to qualify for PPP Loans.

61. On June 10, 2021, CHS-1 received a phone call from R.P., of Warren, RI, regarding PPP loans. R.P. informed CHS-1 that he had just become aware there was a PPP loan out in his business' name. R.P. told CHS-1 that his subcontractor, Roger LNU, had asked R.P. about the \$144,000 PPP Loan he had received, bringing it to R.P.'s attention. On June 15, 2021, CHS-1 made a consensually monitored phone call with agents from the FBI and IRS Criminal Investigation present. CHS-1 telephoned R.P. and asked if R.P. had reported the loan to the Small Business Administration as fraud. R.P. told CHS-1 that he had, and that he suspects MANCIERI was behind the loan being processed. R.P. admitted to CHS-1 during this call that he and MANCIERI had discussed applying for a PPP Loan. R.P. admitted to CHS-1 that he had agreed to allow MANCIERI to apply for a PPP Loan for R.P.'s business, and gave MANCIERI his driver license and social security number.

62. On June 16, 2021, CHS-1 arranged an in-person meeting with MANCIERI at MANCIERI's residence, 114 Algonquin Road, Rumford, Rhode Island. A video and audio recording device was provided to CHS-1 prior to this meeting, and CHS-1 agreed to be recorded. The following are excerpts from the meeting, not the conversation in its entirety:

CHS-1: Now uh... what was Bob all... Bob called me up, what was he doing with that?

MANCIERI: Bob-

Both speak: (inaudible)

CHS-1: I said I don't know what to do, he's like-

MANCIERI: You... He... you need to fucking get to him and tell him. He's fucking accusing me of fucking taking his money.

CHS-1: Yeah.

MANCIERI: I didn't take his fucking money! I helped him apply... I helped Danny apply, I helped Jason apply, I helped Derek apply... Bob Polion... this is exactly, this is exactly what happened.

CHS-1: Yup...

MANCIERI: I finagled his taxes so he could have a big one.

CHS-1: Yup.

MANCIERI: It was a hundred and forty-four thousand dollars, kay.

MANCIERI and CHS-1 continued to discuss R.P.'s PPP Loan submission later in the conversation, at which time, MANCIERI admits to preparing and submitting R.P.'s application on his behalf:

MANCIERI: Nobody stole his money. Nobody stole anything.

CHS-1: Yeah

MANCIERI: I fucking... he gave me access to his information

CHS-1: Yeah

MANCIERI: and I helped fill out his forms

CHS-1: Yeah

MANCIERI: I submitted his forms

CHS-1: Yup

MANCIERI: He never got it.

CHS-1: Yeah

MANCIERI: So, nobody, nobody can get, you can't get money... your bank account
has to match.

CHS-1: Yeah, yup.

MANCIERI: You're Polion Flooring and it has to match all that.

63. Records provided by Itria Ventures LLC, indicate a PPP Loan Application was submitted for Polion Flooring Co LLC. Also provided with the application were PDF copies of Form 1040, Schedule C, Profit or Loss From Business, Form 940 for 2020, Employer's Annual Federal Unemployment (FUTA) Tax Return, and Forms 941, Employer's Quarterly Federal Tax Returns for all four quarters of 2020. Each tax form submitted indicated Polion Flooring Co LLC with an EIN of 85-1174273, and an address of 23 Taddy Avenue, Warren, Rhode Island 02885. According to MANCIERI, these records were "finagled" to deceive Itria Ventures into qualifying Polion Flooring Co LLC for a larger PPP Loan. This PPP loan application sought \$144,972 in funds. Ultimately, the loan was not funded and no funds were disbursed.

64. The IRS Office of Disclosure provided an electronic copy of R.P.'s Form 1040, U.S. Individual Income Tax Return, for the tax year ending December 31, 2020, filed with the IRS on or about February 8, 2021. The filed Form 1040 includes a Schedule C for Polion Flooring Co LLC, and indicates earned gross receipts of \$68,504, less expenses, netting an income of \$1,826. In addition, the IRS Office of Disclosure also included a Certification of Lack of Records indicating the IRS has no other records of business or employment tax filings from Polion or Polion Flooring Co LLC from January 1, 2019 through December 31, 2021.

65. During the same meeting on June 16, 2021, CHS-1 continued the conversation with MANCIERI, as it shifted focus to discuss D.S. and his PPP Loans:

CHS-1: Hey what... you know I saw that, cause Roger showed me, now what why did? Now Danny got sixty-something-thousand?

MANCIERI: Don't... Don't ever say, listen. He knows he that got forty-

CHS-1: No, no, whatshisname, Bob mentioned it to me that he, he only got twenty? You got the commission or something? Like...

MANCIERI: No, no I got, I got fucking, he got, he got forty-eight thousand dollars...

CHS-1: Yup

MANCIERI: Okay, and... I got half of it.

CHS-1: Yea, yea.

MANCIERI: I did, Danny gave me half of it.

After discussing D.S.'s whereabouts for a brief period, the discussion returned to D.S.'s PPP Loan(s):

CHS-1: Yea, yea. No, I just got it from Roger, cause Roger showed... why did he go under Armadillo? Why not he-he get more? Like why Armadillo and not verses Danny?

MANCIERI: When I did Danny's...

CHS-1: Yup

MANCIERI: ... Danny was lucky, and I had done it before they put m-more restrictions on it and that's why Bob got fucked.

CHS-1: Yup

MANCIERI: What happened was... you can, you have two ways to do a PPP loan, you can do it as a self, a sole proprietor...

CHS-1: Yup

MANCIERI: ...and if you it as a sole proprietor the limit is like twenty-four thousand dollars.

CHS-1: Yup, yup.

MANCIERI: What I did with Danny was the first time, I was able to show that he had employees.

CHS-1: Yeah, yeah.

MANCIERI: And when I did that, I was like, oh this is great, I can add enough, where I got sixty-thou, it was sixty thousand.

After CHS-1 explained what the bank CHS-1 used to apply for a PPP Loan had required him to provided, MANCIERI also told CHS-1, he did not use traditional banks:

MANCIERI: I well, I went through a bank, but you go through an online... it's a partner who like, Biz2Credit, uh there's SmartBiz, there's Cabbage,

there's uh Upstart, there's all these different companies. And what they do is they, they just, help fill out all the paperwork, set everything up, and then, they submit it.

CHS-1: Yeah

MANCIERI: Then, once you get the SBA loan... you're all set.

MANCIERI went on to tell CHS-1 about what he did to deceive the banks and the Small Business Administration:

MANCIERI: See the way to do... the way I did it, I finagled the tax paperwork.

CHS-1: Yeah?

MANCIERI: Because the SBA doesn't have the ability to just go to the IRS and be like, "hey let me see if this matches."

CHS-1: Yeah, yup.

MANCIERI: But what they're doing now... Danny's... Danny... they, they're, they're shooting for a second loan to get another sixty, for him to get another sixty thousand. But I fucked it, its all fucked up now, because they were asking for the, the tax guard, which is your uh, uh, like the IRS tax statement, that shows like, oh yea, this matches this.

CHS-1: Yeah, yeah.

MANCIERI: Well once they asked for that, I'm like, alright see ya!

CHS-1: Yeah.

MANCIERI: We ain't getting that sixty thousand!

CHS-1: Well, Dan had, the last time he did taxes was with Doorman right?

MANCIERI: Yea, I know. I mean. But still, they went and looked up and they're like, "oh we're not finding this" and so they must, the SBA must be, have clamped down, and now are like, anyone who's getting a PPP loan we want their tax statement from the IRS, not from you.

CHS-1: Yeah, yeah, that's umm, that's the shit I had to get.

MANCIERI: Because they're probably figuring out that people are finagling their tax paperwork...

CHS-1: Yup

MANCIERI: ...which is, what I was doing.

66. Lastly, MANCIERI explained his agreement with J.F., also known as "Kramer." MANCIERI also stated the "deal" to receive a kickback from the loan proceeds he made with all of the people he applied for PPP Loans on behalf of, including a fourth individual named D.G., of Barrington, RI:

CHS-1: Yeah, I just, that day I called you, Kramer was uh-

MANCIERI: Kramer got his money.

CHS-1: But he was wanting it to go, something with the hot dog stand and it doesn't matter...

MANCIERI: That doesn't matter.

CHS-1: Yeah, yeah.

MANCIERI: You know, Kramer's fucking lucky, he, he, (imitating Kramer) "God, I'm, I only, I'm gonna give you three thou, thirty-five, right? Like, Kramer. No, you... first of all, you went from half, to fucking seven, now you're only going to give me thirty-five?"

CHS-1: He said, he said he's s'posed to give ten. What'd you settle (inaudible)?

MANCIERI: So, I said, fine Kramer, but technically when I did it with everyone else, even Derek, Derek, you know little Derek, Derek got one, he (inaudible laughing), I, he's got a second one coming, and I get half of it, er, ev, that was the deal, I get half of the fucking loan. Well Kramer, you know, crying and fucking, I was like whatever Kramer. I, it's not like I ever want to take your money.

Email Search Warrant

67. On July 28, 2021 I served a Federal Search warrant to Google for email addresses danny18255@gmail.com, kman1825@gmail.com, and kMANCIERI@gmail.com. Google provided the search warrant results on August 10, 2021. Agents reviewed the contents of the email addresses. On March 3, 2021 an email from onlinebanking@ealerts.bankofameric.com sent to DANNY18255@gmail.com revealed jamesmontero1825@gmail.com was added to the Zelle Recipients. On May 21, 2021 an email from no-reply@accounts.google.com to danny18255@gmail.com revealed a recovery phone number 401-345-2278 for email address danny18255@gmail.com. On May 24, 2021 an email from No_Reply@notifications.intuit.com to danny18255@gmail.com revealed a TurboTax order confirmation for KEVIN MANCIERI in the amount of \$128.39 utilizing MasterCard ending in 4433. On May 24, 2021 an email from No_Reply@notifications.intuit.com to danny18255@gmail.com revealed a TurboTax order confirmation for KEVIN MANCIERI in the amount of \$181.90 utilizing MasterCard ending in 4433. On May 29, 2021 at 08:29 AM, an email from no-reply@accounts.google.com to danny18255@gmail.com revealed a new device logged into bobby18255@gmail.com using a Galaxy note 10. On May 29, 2021 at

08:29 AM an email from no-reply@accounts.google.com to danny18255@gmail.com revealed a new device logged into danny18255@gmail.com using a Galaxy note 10. On June 11, 2021 an email was sent from danny18255@gmail.com to DMV.Adj@dmv.ri.gov containing message “Kevin MANCIERI 8981030 8/21/1973 Reference #389327 So this reference number was paid last year back in May 15th 2020. I am trying to renew my licence and it will not let me do too this fine still being imposed. I registered my plate again last August.” This leads me to believe the email account for user danny18255@gmail.com has been utilized by multiple users or one user utilizing multiple email accounts. On June 2, 2021 email from danny18255@gmail.com to satyam.bisht@biz2credit.com revealed a Payroll Report 2020-2021 for “Armadillo Flooring, 114 Algongin Rd, Rumford R.I. 02916 EIN 05-0482626”. The report shows three employees, Danny Step, Paul Ramo, and Tom Carlso (Note: Last Names appear to be cut off). The address on the Payroll Report is the address for Mancieri Flooring and home address of KEVIN MANCIERI. The street address Algoinqin as spelled on the Payroll Report should be spelled Algonguin. This leads me to believe the report has been manipulated. On April 27, 2020, KMAN1825@gmail sent an email to cares@bluevine.com with attachments Image (10).jpg, Image (5).jpg, Image (9).jpg, payroll.xlsx. The Payroll Report 2019 for “Mancieri Flooring, 114 Algongin Rd, Rumford R.I. 02916 EIN 46-45922956.” The report shows three employees, D.S., P.R., and T.C. The report appears to be a modification of the Payroll Report D.S, email address danny18255@gmail.com submitted to satyam.bisht@biz2credit.com in support of the PPP Loan application. On June 24, 2021 satyam.bisht@biz2credit.com sent an email to danny18255@gmail.com containing the message “Hi, As according to our case manager, the business name and EIN do not match IRS records. Thanks.”

68. Two emails dated February 3, 2021 from KMAN1825@gmail.com to KMAN1825@gmail.com contained attachments. In the email with a time stamp of 10:17 contained attachments 20210302_101641.jpg and 20210302_101648. Attachment 20210302_101641.jpg is a picture of the front of IRS Form 940 for 2019 and attachment 20210302_101648 is a picture of the back of the form. The form appears to be the same IRS Form 940 provided in support of the loan application. In the email with a time stamp 10:14 contained attachments 20210302_101401.jpg and 20210302_101408. Attachments 20210302_101401.jpg is the front of IRS Form 941 and 20210302_101408 is the back of the form. The form appears to be the same IRS Form 941 provided in support of the loan application. Email dated February 2, 2021 at 19:03, from KMAN1825@gmail.com to KMAN1825@gmail.com contained attachment 20210227_185412.jpg. The attachment was a picture of a VOIDED check. The check is a Bank of America check from the account of D.S., 18 Williams St. Warrant, RI, account number xxxx xxxx 7068. An email dated February 3, 2021 at 10:10 from KMAN1825@gmail.com to KMAN1825@gmail.com contained attachment 20210225_092058.jpg and 20210225_092118.jpg. The attachments are the back and front of the Rhode Island driver's license of D.S. The driver's license appears to be license provided in support of the loan application.

69. On April 23, 2021, KMAN1825@gmail.com replied to an email from order@ufakeids.com dated December 4, 2019, confirming an order for one fake id for \$80.00. The email contained three attachments, 20210432_164652.jpg, 202010423_164753.jpg and Information-ufakeids.com.doc. Attachments 20210432_164652.jpg and 202010423_164753.jpg are photographs of MANCIERI in front of a blue background, and a signature reading "James Montero" in black ink, respectively. The final attachment,

Information-ufakeids.com.doc, appears to be an order form where the customer includes the desired name, date of birth, height, weight, address, and other information for the fake ID to display. This document attached to the email is not filled out with any information. On April 25, 2021, KMAN1825@gmail.com sent an email to order@ufakeids.com containing attachments Catch8227.jpg and Catch8277_3.jpg. The email contained the following message “Ok the fake id is, James Montero, 05/05/1973, Exp 05/05/2025 issued. 05/05/2020, Address on fake id, 114 Algonquin Rd Rumford, RI 02916 This is the same shipping address To Kevin MANCIERI You should have picture and signature.” On June 9, 2021 an email from jamesmontero1825@gmail.com was sent to kman1825@gmail.com containing attachments 20210609_092449.jpg and 20210609_092458.jpg. Attachments 20210609_092449.jpg and 20210609_092458.jpg. are the back on front of the fake ID as provided to Kevin MANCIERI from order@ufakeids.com per order on April 25, 2021 by KMAN1825@gmail.com. The driver’s license is a photograph of Kevin MANCIERI using the name JAMES MONTERO and ID information provided by KMAN1825@gmail.com on April 25, 2021.

70. On March 31, 2021, an email from MyAccount@hrblock.com was sent to KMANCIERI@gmail.com to confirm a new account created at H&R Block for “Username D.S., Email kMANCIERI@gmail.com. On March 16, 2020 an email from no-reply@accounts.google.com sent an email to KMANCIERI@google.com showing a new device signed into the account using a Samsung Galaxy Note 10+. On May 5, 2021 an email from support@blueacornppp.com to KMANCIERI@google.com containing the following “Thank you so much for submitting your PPP application through Bluecorn!” On March 31, 2020 an email from TurboTax@intuit.com was sent to KMANCIERI@google.com containing the message “Great news, [D.S.]! Your 2019 Rhode Island Personal return was accepted!”

CONCLUSION

71. Based on the forgoing, there is probable cause to believe that, from on or about April 1, 2020 through on or about June 30, 2021, defendant KEVIN MANCIERI did knowingly conspire with others to execute a scheme to obtain money, funds and property owned by, or under the custody and control of, financial institutions, by means of false and fraudulent pretenses, representations and promises, contrary to 18 U.S.C. § 1344(2), in violation of 18 U.S.C. § 1349 (Count One – Conspiracy to Commit Bank Fraud).

Christina Grady
Special Agent



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed.


R. Crim. P. 4.1 by _____

Telephone

(electronic means)

March 29, 2022

Date



Judge's signature

Providence RI

City and State

Magistrate Judge Lincoln D. Almond